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**RWQCB-CVR
FRESNO, CALIF.**

October 9, 2014

Mr. Scott Hatton
Regional Water Quality Control Board
1685 E. Street
Fresno, CA 93706

Dear Mr. Hatton:

RE: Comments on the Tentative Waste Discharge Requirements City of Fresno,
Consolidated Land Company & Consolidated Industries, Inc., North Fresno
Wastewater Reclamation Facility, Fresno County

The City of Fresno (City) is submitting the following comments on the Tentative Waste Discharge Requirements (WDR) for the North Fresno Wastewater Reclamation Facility in Fresno County:

Existing Facility and Discharge

Proposed:

(10.) "... In addition, effluent from the cloth filtration system can be recirculated back to the influent pump station at the WWRF..."

Comment:

There is no provision for direct recirculation from the filters back to the Headworks.
(Note : Attachment "B" should not show a direct line back to the Headworks.)

Proposed:

(11.) In the table on page 3 there is a footnote referencing a total coliform detection of 900 MPN/100mL on 9 October 2011

Comment:

The referenced sample was taken at an incorrect location, and moreover, the effluent that day was not discharged, but rather sent to the Fresno Regional Wastewater Reclamation Facility for further treatment. Therefore, the reference should be deleted from the findings..

Proposed:

(13.) "The former chlorine contact basin will be utilized for flow equalization following disinfection."

Comment:

This sentence should read as follows: .) "The former chlorine contact basin will be utilized for flow equalization prior to disinfection."

Proposed:

(17.) "Uses include annual range and dry farmed small grain, usually barley and limited sprinkler irrigated pasture."

Comment:

Not sure what "uses" are being referred to. Since the prior sentence references soils at the golf course (which is the permitted area of application), isn't the use just "golf course"?

Proposed:

(21.) "... maintain the wells in accordance with Section 24400 of the California Health and Safety Code. . ."

Comment:

Unable to locate the cited code section. The code jumps from §24275 (*asbestos safety*) to §24500 (*infant crib safety*). The City will maintain the groundwater monitor wells and will continue monitoring them on an annual basis.

Ultraviolet disinfection system operating specifications:

Proposed:

(14.e) "Conditions that shall divert effluent to waste include the followingFlow above the maximum flow commissioned of 150 gpm per reactor."

Comment:

The commissioned system automatically calculates the treatment capacity for each train, which typically will be higher than the 150 gpm design flow per reactor. In order to prevent having to turn on additional lamps and use power that would otherwise not be necessary, and to make full use of the specified control system functions that are required, this requirement should be modified to allow each individual reactor to treat flow rates up to the capacity of the individual train, as determined by the control system specified in Specification D4.

I. Provisions

Proposed:

(3.) "... Section 24400 of the California Health and Safety Code . . ."

Comment:

Unable to locate the cited code section. The code jumps from §24275 (*asbestos safety*) to §24500 (*infant crib safety*). The City will maintain the groundwater monitor wells and will continue monitoring them on an annual basis.

Monitoring and Reporting Program – UV Disinfection System Monitoring

Proposed:

Units for Intensity and Dose are specified as mW/cm and mW-sec/cm², respectively.

Comment:

Units should be consistent with operating system specifications, i.e., mW/cm² and mJ/cm², respectively).

If you have any questions regarding these comments, please contact Rick Staggs at (559)621-5190 or at rick.staggs@fresno.gov

Respectfully submitted,



for

Stephen A. Hogg
Assistant Director
Department of Public Utilities